



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

SMALL BUSINESS/SELF-EMPLOYED DIVISION

SBSE-05-0606-025
Exp: September 30, 2006
Impacted IRM: 5.1.9

June 14, 2006

MEMORANDUM FOR DIRECTORS, COLLECTION AREA OPERATIONS

FROM: Frederick W. Schindler [/s/ Frederick W. Schindler](#)
Director, Collection Policy

SUBJECT: Interim Guidance on Processing Closed Collection Due Process (CDP) Cases

This memorandum provides procedures for processing closed CDP cases.

Once the determination is final or a decision has been made, the Appeals office that conducts the hearing sends the case to Appeals Processing Service (APS) in Fresno, Memphis, or Brookhaven for back-end processing.

If the collection action was sustained, APS will update the CDP tracking system to Stage 13, Appeals Case Closed. APS will input the TC 521 on CDP cases and return the case to the originating office via a Form 3210. Once received, the originating office will update the CDP tracking system to Stage 14, Closed Case Received from Appeals.

If there was a collection alternative reached by the Appeals office such as an installment agreement, offer in compromise, adjustment, or currently not collectible determination, APS will taking the necessary action to input the collection alternative.

On an interim basis, Centralized Case Processing (CCP) is assisting Appeals on the backend processing of CDP work. On cases where Appeals secures a collection alternative, APS is sending the case to Centralized Case Processing (CCP) for processing.

- Upon receipt, CCP establishes an IDRS control base. This identifies the case as being worked in CCP.
- CCP will take the requested action and input the TC 521 as applicable.
- Once the closing actions are taken, the case file will be sent to the originating office via a Form 3210.

The CDP Other Investigation (OI) established as a case control should be kept open until all closing actions have been taken or the case is reassigned back to Collection.

Follow-up with Appeals 90-days after the determination if the closing action hasn't been taken or the case has not been returned. If it is known that the taxpayer appealed the CDP determination, allow additional time for the judicial appeal before follow-up. The following contact points are available to assist in determining the status of a closed CDP case:

- Memphis – Dora Washington at (901) 786-7527
- Fresno – Charlene Stacy at (559) 452-3085
- Brookhaven – Mary Labartino at (631) 687-8003
- CCP – Janice Sutch at (215) 516-3839

Internal Revenue Manual 5.1.9 will be updated by September 30, 2006 to reflect Appeals processing of closed CDP cases.

If you have any questions, please contact me or have a member of your staff contact Anastasia Agne. Field employees should raise any questions or concerns through the appropriate management chain.

cc: Director, Collection